

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GARY KOOPMANN, TIMOTHY KIDD and
VICTOR PIRNIK, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff(s),

v.

FIAT CHRYSLER AUTOMOBILES N.V.,
FCA US, LLC, RONALD ISELI AND
ALESSANDRO BALDI, AS CO-EXUCUTORS
FOR THE ESTAT OF SERGIO
MARCHIONNE, RICHARD K. PALMER,
SCOTT KUNSELMAN, MICHAEL DAHL,
STEVE MAZURE, and ROBERT E. LEE,

Defendants.

Civ. Action No: 15-cv-07199-JMF

CLASS ACTION

**CLASS REPRESENTATIVES' UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT**

Pursuant to Fed. R. Civ. P. 23(e), Class Representatives Gary Koopmann, Timothy Kidd and Victor Pirnik (together, "Plaintiffs"), individually and on behalf of all Class Members, hereby move this Court for an order: (i) granting preliminary approval of the proposed Settlement; (ii) approving the proposed notice program with respect to the Class, including the mailed Notice, the publication of the Summary Notice, and the posting of the Stipulation and its Exhibits on a website maintained by the Claims Administrator; (iii) setting a date for a Settlement Fairness Hearing; and (iv) setting deadlines for the mailing of the Notice and publication of the Summary Notice, for Class Member objections and Class Member opt-out notices, for the filing of Plaintiffs' motion for Final Approval of the Settlement, and for the filing

of Class Counsel's application for an award of attorneys' fees and reimbursement of expenses and compensatory awards to Plaintiffs.

This motion is based upon the accompanying Memorandum of Law and Stipulation of Settlement, with its Exhibits, which are filed contemporaneously herewith, and other such matters and argument as the Court may consider at the hearing on this motion.

Defendants do not oppose the relief sought by this motion.

Dated: April 5, 2019

Respectfully submitted,

POMERANTZ LLP

/s/ Jeremy A. Lieberman

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CERTIFICATE OF SERVICE

I hereby certify that on this, the 5th day of April, 2019, a true and correct copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Jeremy A. Lieberman
Jeremy A. Lieberman